

MAY 09 2025

KEVIN P. WEIMER, Clerk
By: *Cem* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

KENDALL GREY

Criminal Information

No. 1:25-CR-212

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One

(Bank Fraud – 18 U.S.C. § 1344)

1. From on or about July 27, 2022, and continuing through on or about January 9, 2023, in the Northern District of Georgia and elsewhere, the Defendant, KENDELL GREY, aided and abetted by others known and unknown, did knowingly execute and attempt to execute a scheme and artifice to defraud Bank of America, a financial institution whose deposits were then insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institution, by means of materially false and fraudulent pretenses, representations, and promises, and by the omission of material facts.

Background

At all times relevant to this Information:

2. A “retirement account scam” was a type of fraud that occurred when an investment management company was tricked into authorizing a distribution to an imposter posing as the true accountholder. The imposter often initiated the

scam by telephonically contacting the investment management company, identifying himself or herself as an actual accountholder and providing the accountholder's real personal identifying information (PII), and requesting a withdrawal distribution. After the investment management company processed the fraudulent request, the funds were paid out of the retirement account.

3. To facilitate the retirement account scam, the imposter often created phony identification documents for the victim accountholder in order to open bank accounts in the victim's name, which were used to receive and launder the stolen funds.

4. Bank of America was a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation (FDIC).

5. The Defendant, KENDELL GREY, resided in the Atlanta metro area and was employed as a Relationship Manager Business Owner Specialist at a Bank of America branch in the Northern District of Georgia.

The Scheme and Artifice to Defraud

6. On or about August 11, 2022, a conspirator created a web registration for victim M.B.'s online retirement account.

7. On or about August 12, 2022, a conspirator submitted a request via telephone for a distribution from M.B.'s account.

8. On or about August 23, 2022, \$458,123.95 was withdrawn from M.B.'s account, and disbursement check #0023018325 for approximately \$366,499.16, the account balance after withholdings submitted directly by the financial institution to the Internal Revenue Service, was issued to M.B. The financial institution

mailed the check to an address in Philadelphia, Pennsylvania, that was not the true address of M.B.

9. On or about September 16, 2022, in the Northern District of Georgia, the Defendant, KENDELL GREY, fraudulently opened a Bank of America personal account, ending in 0685, in M.B.'s name, for a conspirator posing as M.B.

10. On or about September 16, 2022, in the Northern District of Georgia, a conspirator deposited check #0023018325 into the Bank of America personal account ending in 0685.

11. On or about October 6, 2022, in the Northern District of Georgia, the Defendant, KENDELL GREY, fraudulently opened a Bank of America personal account, ending in 2432, in M.B.'s name.

12. On or about October 6, 2022, an electronic transfer in the amount of \$50,000 was made from the Bank of America personal account ending in 0685 to the Bank of America personal account ending in 2432.

13. Funds were then depleted from the accounts through a series of financial transactions, including electronic transfers, checks, and cash withdrawals.

Execution of the Scheme and Artifice to Defraud

14. On or about September 16, 2022, and on or about October 6, 2022, in the Northern District of Georgia, the Defendant, KENDELL GREY, for the purpose of executing and attempting to execute the bank fraud scheme, opened Bank of America accounts in the name of victim M.B. and assisted conspirators in withdrawing fraudulent funds from those accounts.

All in violation of Title 18, United States Code, Section 1344 and Section 2.

Forfeiture Provision

15. Upon conviction of the offense alleged in this Information, the Defendant, KENDELL GREY, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to, the following:

MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of the offense alleged in this Information.

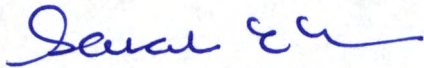
16. If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the

forfeitable property.

RICHARD S. MOULTRIE, JR.
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